

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	Case No: 2:19-cr-00013
v.	)	
	)	Chief Judge Crenshaw
GEORGIANNA A.M. GIAMPIETRO	)	

**JOINTLY PROPOSED STATEMENT OF THE CASE**

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorneys for the Middle District of Tennessee and the Trial Attorney for the Counterterrorism Section of the Department of Justice, and with the agreement of defense counsel, as evidenced by the signatures below, hereby submits the following jointly proposed statement of the case.

In this criminal case, the defendant is charged in a three-count Indictment. Count One charges that beginning on or about February 22, 2018, and continuing through on or about October 23, 2018, the defendant knowingly attempted to provide material support and resources, to wit: personnel and services, to a foreign terrorist organization, namely, the Hay'at Tahrir, also known as Hay'et Tahrir al-Sham, also known as Hayat Tahrir al-Sham, also known as HTS, knowing that the organization was a designated foreign terrorist organization and knowing that the organization had engaged in, and engages in, terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).

Count Two charges that between March 2018 and on or about October 23, 2018, the defendant knowingly altered, destroyed, mutilated, concealed, and covered up a record or document, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation, a

department and agency of the United States, that is, a possible violation of Title 18, United States Code, Section 2339B(a)(1), in violation of Title 18, United States Code, Section 1519.

Count Three charges that between on or about September 23, 2018, and on or about October 23, 2018, the defendant knowingly and corruptly did alter, destroy, mutilate, and conceal a record and document, including, but not limited to, contact information, text messages, electronic communications, and a cell phone, and corruptly did attempt to do so, with the intent to impair the record and document's integrity and availability for use in an official proceeding, namely, a grand jury investigation into a possible violation of Title 18, United States Code, Section 2339B(a)(1), in violation of Title 18, United States Code, 1512(c)(1).

The defendant has pleaded not guilty to each of these charges.

Respectfully submitted,

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Approved for Entry:

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